Inspired Pursuits, LLC
6300 Enterprise Ln
Madison, WI 53719

June 7, 2024

Mr. Stephen E. Kabakoff
Miller & Martin, PLLC
1180 W. Peachtree St., NW, Ste 2100
Atlanta, GA 30309-7706

Via Email at stephen.kabakoff@millermartin.com and Deloris.Lanus@millermartin.com

Dear Stephen:

I apologize for the delay in responding to your email below. Our son graduated from high school on May 26, then last weekend participated in the Division 2 Wiconsin State track meet where they became the fifth 2-time D2 champions, and we are holding his graduation party later today. Given that I received your first letter on May 23, 2024, I have not been able to focus on all the issues before us in as detailed and non-distracted manner as I otherwise would have.

From this point forward, it is important to separate the professional engineering issues from the business issues. This begins with this letter, which is focused on our fiduciary and management responsibilies as they relate to Inspired Pursuits (IP-LLC)

Thank you for your June 4, 2024 email communication regarding IP-LLC, which follows:

> **From:** Stephen Kabakoff <Stephen.Kabakoff@millermartin.com>
> **Sent:** Tuesday, June 4, 2024 1:53 PM
> **To:** Kirk Grundahl <kgrundahl@qualtim.com>
> **Cc:** Deloris Lanus <Deloris.Lanus@millermartin.com>; Suzi Grundahl <sgrundahl@qualtim.com>; Jill Zimmerman <jzimmerman@qualtim.com>; Keith Hershey <khershey@qualtim.com>
> **Subject:** RE: Paragon Component Systems, LLC - Requested Response from Qualtim and Inspired Pursuits
>
> Hi Kirk,
>
> Thank you for clarifying several of Qualtim's positions in your letter this morning. I have shared your letter with our client and we have the following additional questions (based on your letter) to ensure that everyone is on the same page.
>
> First, can you please refer us to the specific "engineering laws" that you reference in your letter today and in your previous letters? To understand if Qualtim has a valid argument in this regard, we need to know which "engineering laws" you are relying on.
>
> **Second, and similarly, can you please refer us to any specific written contract(s) between Qualtim/DrJ, Paragon, CCI, and/or Inspired Pursuits that you are relying upon in asserting that all intellectual property of Paragon and CCI should be owned by Inspired Pursuits (e.g., see item #6 in today's letter)?**
>
> **Third, can you please clarify what is the specific intellectual property of CCI that you believe should be owned by Inspired Pursuits (e.g., see item #6)?**
>
> Many thanks in advance for your additional clarifications. To be clear, our client has not "stipulated" to any of the items #1-8 in your letter, as these are merely Qualtim's current assertions, but we are trying our best to understand the assertions that you are making.
>
> Best regards,
>
> Stephen

I appreciate that your June 4, 2024 email is focused on item #6, which is attached as Exhibit A and highlighted in blue for reference. To address your questions, at a high level, I would draw your attention to:

1. The highlighted items in Exhibit B.
2. The highlighted items in Exhibit C.

Beyond the information provided in the attached Exhibits B and C, which support our item #6 stipulation, your client should have all the direct evidence needed to prove #6, as I have stipulated. If your client believes item #6 is not true, then your client presumably has direct evidence of this being the case, along with similar direct evidence for all other highlighted items delineated in Exhibit A. Otherwise, the stipulations made, from an IP-LLC fiduciary point of view, remain true. Please provide all such evidentiary documentation to us. We will review and determine if it is consistent and congruent with all the IP-LLC information available to us, and its business mission, goals, strategy and tactics, which were and are well understood by each of the IP-LLC members and managers.

EXHIBIT G

Confidential intellectual property (IP) and trade secrets (TS) are protected by Defend Trade Secrets Act 2016, © 2024 Inspired Pursuits, LLC

I just, in the last 2-days, learned of recent actions, taken unilaterally by your client, which resulted in Exhibit D. I suspect that Dan Holland, as an owner of IP-LLC, Clearspan Components, Inc. (CCI) and Paragon, did NOT give his approval for Paragon to take this unilateral action, given:

1. The confidential nature of the intellectual property (IP) and trade secrets (TS) involved.
2. That the goal of all IP-LLC IP and TS is to be used to create a competitive advantage for CCI, over all CCI competitors.
3. That SBCA is made up of competitors to CCI, where this action promotes and is intended to provide IP-LLC IP and TS to CCI's direct competitors.
    a. As one of the managers with key IP-LLC strategic knowledge, this action came as a complete surprise to me, where tradition says there would be no surprises.
    b. Dan was in charge of and responsible for approving and directing all work by Paragon in concert with the current vison, mission and tactics of IP-LLC, which we discussed at least weekly, and often several times per week.
    c. As a manager of IP-LLC, I am completely unaware of any action your client took to have this unilateral action approved by Dan or IP-LLC.
4. That this highly public disclosure of IP-LLC's IP and TS does great harm to key CCI business tools that create competitive exclusivity, which will lead to greater CCI profits.
    a. Ironically, this directly harms Dan's family's best interests, as well.

Immediate retraction by Paragon from this competition is essential.

Furthermore, any Paragon interactions with SBCA, Virginia Tech, NCSEA and any other public forums, similar to these, should be immediately curtailed, particularly given your client's lack of understanding of the strategies that were and are being deployed to foster CCI, DrJ and IP-LLC sales success.

Finally, as one of the members and managers of IP-LLC, who, since 2004, has been working with Dan Holland on the implementation of our united strategic plan, all the information provided to you in the past can easily be misinterpreted, given major gaps in context and event chronology. Unfortunately, our communications show that there is likely confusion by your client with respect to all the strategic actions taken since 2004. This lack of complete knowledge, which I fully understand why this would be the case, then causes even greater harm to CCI, DrJ and IP-LLC to continue to take place.

Thank you very much, and I sincerely hope we can get back to focusing on the epic success available to CCI, DrJ and IP-LLC, which can only be fully realized when Paragon stays in its lane and is totally focused upon its role of supporting this team's success, versus the significant damage to all past very positive relationships that your client have been and continues to unilaterally cause.

Respectfully,

Kirk Grundahl
Manager
608-217-3713

PS Please note that nothing contained in this letter, nor any act or omission to act by IP-LLC is intended or should be deemed a waiver or modification of any rights or remedies that IP-LLC may have at law or in equity, and all such rights are expressly reserved.

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